

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own
motion into the appropriate regulatory plan
to succeed price cap regulation for Verizon
New England Inc. d/b/a Verizon Massachusetts'
retail intrastate telecommunications services in
the Commonwealth of Massachusetts

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DTE 01-31

**VERIZON MASSACHUSETTS
FIRST SET OF INFORMATION REQUESTS TO NETWORK PLUS**

Verizon New England Telephone Inc. d/b/a Verizon Massachusetts ("Verizon MA") requests that Network Plus respond to the following information requests addressed to it or its witness. In the event responses to all or part of these requests will not be forthcoming in the time period established for this proceeding by the Department of Telecommunications and Energy ("Department"), kindly notify Verizon MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if Network Plus or its witness receive or generate additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If Network Plus feel that any request is ambiguous, please notify Verizon MA so that the request may be clarified prior to the preparation of a written response.

DEFINITION AND INSTRUCTIONS

1. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

2. "Verizon" means Verizon New England, Inc. d/b/a Verizon Massachusetts.

3. "Document" and "documentation" are used in the broadest sense to mean all writings and records of every type, including without limitation, written, printed, typed or visually reproduced material of any kind, the original and all copies of any and all letters, reports, memoranda, files, communications, correspondence, agreements, bills, receipts, studies, analyses, telegrams, telexes, minutes, bulletins, instructions, literature, memoranda of conversations, notes, notebooks, diaries, data sheets, financial statements, work sheets, recordings, tapes, drawings, graphs, indexes, charts, telephone records, photographs, photographic records, computer files, whether or not such files are presently in a hard copy form, other data compilation, or any other written recorded, transcribed, punched, taped, filed or other graphic matter including any draft of the foregoing items and any copy or reproduction of any of the foregoing items upon which any notation, work figure, or form is recorded or has been made which does not appear on the original or as to whose existence, either past or present, the responding party has any knowledge of information. "Document" and "documentation" shall also mean copies of documents, notwithstanding that the originals thereof are not in your possession, custody or control, and all attachments to any document.

4. If Network Plus cannot answer a request in full, answer to the extent possible and state why it cannot answer the request in full.

5. If Network Plus refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

6. Please serve a copy of the responses to these requests on Verizon MA's attorney, Victor D. Del Vecchio, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including email, shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

Referring to the Testimony of August Ankum filed on August 24, 2001.

1. Please provide all data and an electronic spreadsheet showing the calculations underlying the results depicted on the three tables in AHA Exhibit - 3.
2. Please confirm that "Tables 2.2 through 2.4" referred to in footnote 16 are the three tables in AHA Exhibit -3. If not, please provide tables 2.2 through 2.4.
3. Please provide the document referred to in footnote 17.
4. Please provide the Debt to Equity ratio referred to on Page 20, Line 10. Also, provide all data and calculations (in an electronic spreadsheet) used to obtain the Debt to Equity ratios.